

## Initiate

### Scope Project

- Understand the relevant law and regulations of the applicable jurisdictions in regards to data privacy, protection, and security
- State the purpose and lawful basis for processing personal or sensitive data
- Annotate project-specific scope by articulating with specificity which data is necessary and proportionate to both analyze and retain post-project based on content attributes
- Set risk tolerance to help determine the actions to effectively pseudonymize or anonymize the data set(s)

#### Tech's Role

- Analyzes legal filings against a structured reference data set of laws using text recognition / AI models
- Automates purpose and lawful basis processes by using an exhaustive list of options for lawful basis to automatically populate data entered in a workflow
- Automates risk tolerance processes by using an exhaustive list of risk levels and situational strategy decisions

### Create Operational Guidelines and Rules

- Outline how team members treat data containing personal or sensitive information and the chosen data anonymization action: data masking, pseudonymization, generalization, data swapping, data perturbation, synthetic data, redaction, or even withholding
- Use to drive clear operational decisions once the data is identified, collected, and processed

#### Tech's Role

Automates chosen action(s) based on operational guidelines and rules that are programmed into the software

### Identify Data

Define custodians and data sources

#### Tech's Role

- Helps track and catalog available data sources
- Future generative AI technologies may make it easier to identify relevant data using LLMs and prompts

### Collect Data

Gather data from identified sources

#### Tech's Role

- Pulls data from sources into a platform for processing
- Reduces collection of ROT data by excluding non-relevant documents using date filters, export rules to filter junk / system files, etc.

### Process Data

Load and process collected data

#### Tech's Role

- Quickly manages large data volumes
- Eliminates manual workflows and reduces human error
- Reduces hosting of ROT data through de-duplication, de-NISTing, etc.

## Investigate

### Search

Run searches to find pertinent data

#### Tech's Role

- Locates data containing personal or sensitive information
- Reduces review volume / ROT data

### Evaluate Results

Review search results and cull data to maximize protection of personal or sensitive information

#### Tech's Role

- Provides opportunity for human input and analysis recording
- Leverages human input and analysis to update any project and / or client-level active learning or automation

### Analyze Data

Examine data to find personal information and sensitive information

#### Tech's Role

Provides explanations and citations to help validate output

### Apply Strategic Decision-Making

Apply the chosen action to the data set based on the decision points outlined in the Scope Project step and in the operational guidelines and rules

#### Tech's Role

- Visualizes and dashboards statistics regarding both analysis of and actions applied to the personal or sensitive data in the data set
- Documents decision points for defensibility

## Implement

### Synthesize and Redact

Conduct defensible quality control of the anonymization effort through statistically significant sampling

#### Tech's Role

- Tracks document counts and tags files
- Automates redactions to protect PII and adhere to privacy regulations
- Helps with quality control by identifying errors or inconsistent coding, standardizing production rules, etc.

### Protect Data

Ensure ongoing protection of data

#### Tech's Role

- Sets disclosure of protected data through secure password-protected transmission tools
- Establishes audit and access logs using permission-oriented transfer technology